



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

APR 27 1987

MEMORANDUM

SUBJECT: Transmittal of Inspection Report

FROM: Robert B. Dona *RBDona*
Chief, RCRA Monitoring Section, EMCM/ENSV

TO: Michael J. Sanderson
Chief, RCRA/WSTM

This memorandum transmits the following joint RCRA compliance inspection report performed by the RCRA Monitoring Section, Environmental Monitoring & Compliance Branch, Environmental Services Division.

<u>Facility</u>	<u>EPA I.D. Number</u>	<u>Activity Number</u>	<u>Areas of Non-Compliance</u>
Olin Water Services - Olin Corporation Kansas City, Kansas	KSD000203638	APF46	1. Inspection Logs 2. Drum Storage 3. Training Records 4. Waste Classification

Attachments

RECEIVED
APR 27 1987
USEPA, RCRA Branch

RCRA INSPECTION REPORT RECEIPT AND FOLLOW-UP REQUEST

Facility Name: *OLIN WATER SERVICES - OLIN CORPORATION*

Facility Location: *KANSAS CITY, KS*

EPA ID Number: *KS0000203638*

Date of Inspection: *4/20/87*

Inspector: *JOHN W. BOSKY*

Activity Number: *APF 46* Inspection Type: *JOINT OVERVIEW*

Date Report Transmitted: *4/23/87*

*Date Report Received: */ /*

*Additional Information Requested/Needed Not Included In Report:

#Photographs Taken: *0* #Photographs in Report: *0*

*Additional Copies Needed (Specify Which)

*Additional Information Needed By: */ /*

Field Notes Taped [Yes/No]

*Disposition: Retain, Discard, Transcribe.

#Samples Taken: *0* #Samples Analyzed: *0*

*Disposition: Retain, Discard, Analyze more (specify which)

*Report Reviewed By:

*Date Review Completed: */ /*

*Items to be completed by RCRA Branch, WSTM and returned to Chief, Field Investigations Section, EMCM/ENSV

REPORT OF JOINT RCRA COMPLIANCE INSPECTION

AT

OLIN WATER SERVICES - OLIN CORPORATION

KANSAS CITY, KANSAS

EPA I.D. NUMBER: KSD000203638

APRIL 20, 1987

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VII

Environmental Services Division

INTRODUCTION

At the request of the Waste Management Division (WSTM), a joint RCRA compliance inspection was performed at the Olin Water Services - Olin Corporation facility in Kansas City, Kansas, on April 20, 1987. This inspection was performed with the Kansas Department of Health and Environment as a means of evaluating the effectiveness, reliability and completeness of the State's inspection procedures in the administration and enforcement of their hazardous waste program established pursuant to Section 3006 of the Resource Conservation and Recovery Act (RCRA), as amended. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Olin Water Services - Olin Corporation (Olin):

Larry M. Prouty, Regulatory and Product Liability Affairs Specialist

William E. Dame, Plant Manager

Kansas Department of Health and Environment (KDHE):

Jim D. Fischer, Environmental Technician, Lawrence District Office

Janel J. Rogers, Environmental Engineer, Hazardous Waste Section

U.S. Environmental Protection Agency (EPA):

John W. Bosky, Environmental Engineer

FACILITY DESCRIPTION

The Olin facility formulates over 300 different water treatment products on a batch basis. The batch formulating schedule varies with demand for product and warehouse inventory. After formulation, each batch is sampled and analyzed using company prescribed techniques. The product is adjusted, as necessary to meet the product specification, then is drummed for shipment or storage. Some product is also pumped to rail tank cars for shipment. This facility employs around 25 persons (includes both laboratory and manufacturing workers).

Off-specification products from this facility are currently being reused by blending them with new batches of the same (or a similar) product which do meet the product specification. Rinsewater from one formulating area (VSR Room) is collected, and is usually used as make-up water for succeeding batches. Rinsewater from the other two formulating areas is discharged to the municipal sewer collection system. Some products which were warehoused at other locations have been returned to the Olin facility (deteriorated with age or unuseable for some other reason). This material is being reused as possible. Any dry spillage during drum loading operations is swept up and placed into a product drum. Any liquid spillage is either washed down into the rinsewater collection system or is collected with an absorbent and containerized. Empty, unuseable drums are triple rinsed, crushed and disposed of with the facility trash. Non-hazardous solid wastes are periodically disposed of at the Johnson County Landfill.

The company is housed in two buildings which are separated by several sets of railroad tracks. One building serves as a warehouse of raw materials (unformulated new chemicals) and finished products, and also contains some offices. The other building houses offices, extensive laboratory facilities and the batch blending tanks with related equipment. Olin's hazardous waste storage area is located adjacent to this building. Raw materials and finished products are shuttled by truck to and from the blending area on a daily basis.

Olin has been issued a final permit by the KDHE for the storage of up to 200 drums of hazardous waste with the waste codes D001, D002, D003, D007, U031, U070, U114, U133 and U242. At the time of this inspection, Olin was storing approximately 137 containers of hazardous waste. Wastes in storage included unuseable raw materials, unuseable or off-specification products, non-reuseable rinsewater, spent solvents and chromium-contaminated wood (from the dismantling of a blending tank platform).

INSPECTION FINDINGS AND CONCLUSIONS

Based on this inspection, the State inspector determined that the Olin facility was not meeting some of the requirements pursuant to rules under the Kansas Hazardous Waste Management Law and/or some of the requirements specified in the final permit issued to the facility. The following items were noted by Mr. Fischer as needing correction and/or improvement:

1. Several of the inspection log entries did not list the full name of the inspector (left blank or ditto marks).
2. Wastes classified as ignitable were being stored in drums that were stacked three high. Olin's Part B Permit Application states that drums with ignitables are to be placed in stacks that are no more than two high.
3. Two containers at the storage area were not in good condition. Mr. Fischer indicated that these drums should be repacked prior to off-site transportation.

4. Training records for an individual listed as an alternate emergency coordinator were not located on-site (were said to be located at another Olin facility).

5. Some containers of waste described as a "Poison B" did not display "Poison" warning labels (placement of warning labels is not required until the drum is prepared for actual shipment).

6. Some containers of waste did not display an accumulation start date pursuant to KAR 28-31-8(b).

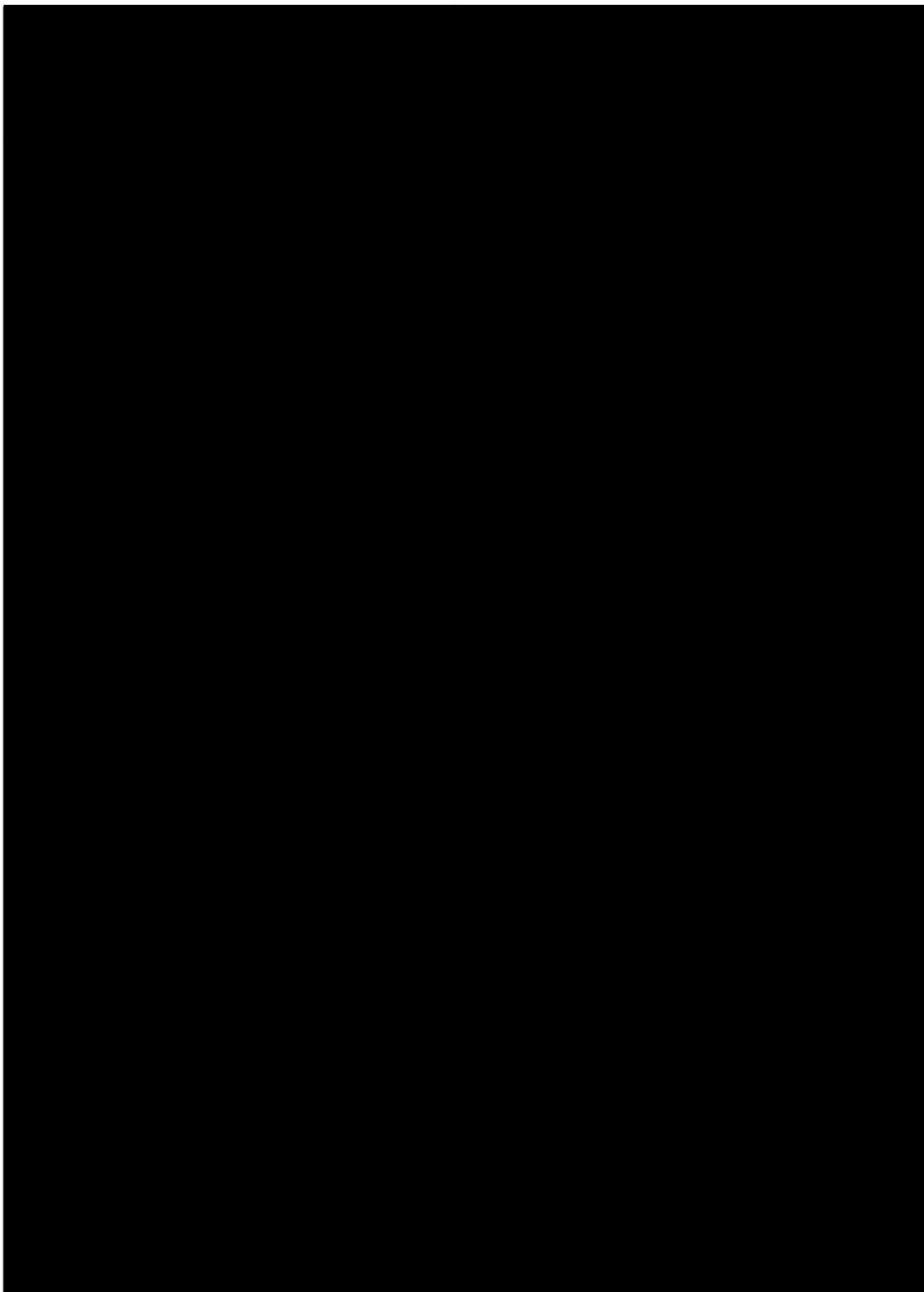
7. During this inspection, several large cans holding smaller containers of chemicals were observed. This material was initially observed during the last compliance inspection at this facility. Facility representatives indicated that while some of the chemicals might still be useable, some of them may be disposed of. The chemicals were apparently taken out of use due to passage of their expiration dates. It did not appear as though an inventory was available for these chemicals. Mr. Fischer expressed concern regarding the continued storage of these chemicals, and indicated that he would discuss the regulatory status of these chemicals with other KDHE officials. Facility representatives indicated that a decision regarding the fate of these chemicals would be reached by October (as part of a clean-out of unneeded chemical supplies at their laboratories).

8. Small amounts of "F-listed" spent chlorinated solvents (chloroform and/or methylene chloride) are being added to drums of hazardous waste at Olin that have been identified/classified as ignitable (D001) only. This action would apparently cause the entire waste mixture to be properly classified as "F-listed" hazardous waste. Olin's permit does not allow them to store "F-listed" spent solvents. Additionally, facility representatives stated that some of their ignitable wastes might be burned for energy recovery in a boiler located at another Olin facility. Spent chlorinated solvents typically do not have a legitimate fuel value, and should not be added to a waste that is to be burned for energy recovery. Mr. Fischer stated that he would discuss this situation with other KDHE officials, and that Olin should stop mixing their spent chlorinated solvents with other facility wastes. Mr. Fischer also requested that Olin submit to the KDHE information regarding the quantities of spent chlorinated solvents being generated.

Ex. 2



Ex. 2





John W. Bosky
John W. Bosky
Environmental Engineer
Date: 4/23/87
Activity Number: APF46

Robert B. Dona
Robert B. Dona
Chief, RCRA Monitoring Section
Date: April 23, 1987

Attachments:

Overview Checklist (4 pages)

JOINT RCRA OVERVIEW INSPECTION CHECKLIST

Date of Inspection: APRIL 20, 1987

Facility Name/Location OLIN WATER SERVICES - OLIN CORPORATION

3155 FIBERGLASS ROAD

KANSAS CITY, KS 66115

Facility Phone Number: 913/621-6440

Facility EPA/State ID Number(s): KSD0000203638

Facility Classification: ☒ Generator ☐ Transporter ☒ TSD facility

☒ Resource Recovery Facility

Participants: Name Title

Facility: LARRY M. PEUTY, REGULATORY AND PRODUCT LIABILITY AFFAIRS SPECIALIST

WILLIAM E. DAME, PLANT MANAGER

State: W.D. FISCHER, ENVIRONMENTAL TECHNICIAN, LAWRENCE DISTRICT OFFICE

JANEL T. ROGERS, ENVIRONMENTAL ENGINEER, HAZARDOUS WASTE SECTION

EPA: JOHN W. BOSKY, ENVIRONMENTAL ENGINEER

Ex. 2

Comments: SEE NARRATIVE FOR ALL COMMENTS.

